

ORIGINAL

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

NOV 21 1995

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In Re)
)
Amendment of Section 73.202(b))
Table of Allotments,)
FM Broadcast Stations)
Houston and Palmer, AK)

MM Docket No. _____
RM- _____

To: Chief, Policy and Rules Division

DOCKET FILE COPY ORIGINAL

PETITION FOR RULEMAKING

Chester P. Coleman ("Coleman"), by his attorney, hereby petitions for amendment of Section 73.202(b) of the Commission's Rules, Table of FM Allotments, to substitute Channel 234C1 for 238C1 at Palmer, Alaska, and to substitute Channel 238C2 for Channel 232A at Houston, Alaska.

Coleman is the permittee of Station KADX(FM), Houston, Alaska, and is prosecuting an application to reinstate his expired construction permit for Station KEEN(FM), Palmer, Alaska. Coleman has on file an application for a one-step upgrade of Station KADX to Class C2 on Channel 232. The KADX one-step upgrade application is short-spaced to the recent allotment of Channel 229C2 at Anchorage, Alaska, in MM Docket 94-62. This rulemaking proposal is being filed to eliminate the conflict between the facilities proposed in the KADX one-step upgrade application and the Channel 229C2 allotment.

Attached hereto is an Engineering Statement which establishes that proposed channel substitutions at both Palmer

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and Houston, Alaska, comply with the Commission's FM channel separation requirements. As the proposed substitutions will enable Coleman to upgrade KADX' facilities and thereby make more efficient use of its frequency and serve a wider area and population, grant of this petition will clearly serve the public interest.

If this Petition is granted, Coleman will promptly amend his pending application to upgrade Station KADX (or file a new application if required) to specify operation on Channel 238C2 and will construct KADX on the new channel expeditiously upon grant of the upgrade application.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'David Tillotson', with a long horizontal flourish extending to the right.

David Tillotson
3421 M Street, N.W., Suite 1739
Washington, DC 20007
Tel: 202/625-6241

Attorney for Chester P. Coleman

Date: November 15, 1995

JAMES B. HATFIELD, PE
BENJAMIN F. DAWSON III, PE
THOMAS M. ECKELS, PE

PAUL W. LEONARD, PE
L.S. CHRISTIANE ENSLOW
STEPHEN S. LOCKWOOD, PE

HATFIELD & DAWSON
CONSULTING ELECTRICAL ENGINEERS
4226 SIXTH AVE. N.W.
SEATTLE, WASHINGTON 98107

TELEPHONE
(206) 783-9151
FACSIMILE
(206) 789-9834
MAURY L. HATFIELD, PE
CONSULTANT
Box 1326
ALICE SPRINGS, NT 5950
AUSTRALIA

ENGINEERING REPORT:

PETITION FOR RULEMAKING TO AMEND SECTION 73.202 OF THE RULES AND REGULATIONS OF FEDERAL COMMUNICATIONS COMMISSION

PRESENT:

KEEN(FM) (BPH-930204MA) CHANNEL 238C1 AT PALMER, AK
AND
KADX(FM) (BMPH-941007IG) CHANNEL 232C2 AT HOUSTON, AK

PROPOSED:

KEEN(FM) CHANNEL 234C1 AT PALMER, AK
AND
KADX(FM) CHANNEL 238C2 AT HOUSTON, AK

CHESTER P. COLEMAN

10/95

This Engineering Statement has been prepared on behalf of Chester P. Coleman in support of a Petition for Rulemaking to allocate channel 234 for use at Palmer, Alaska, by station KEEN, and substitute channel 238C2 for use at Houston, Alaska by station KADX.

It is proposed to revise §73.202 to allocate channel 234C1, rather than 238C1, for use in Palmer, Alaska, and to substitute channel 238C2, rather than 232C2, for use in Houston, Alaska. As outlined in the attached channel studies, channel 234C1 can be assigned for use at Palmer if channel 238C2 is assigned for use at Houston in complete compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments. The sites used for these studies are the CP site of KEEN(FM) for Palmer and the licensed site of KYES(TV) for KADX at Houston.

The 70 dBu contours of both KEEN(FM), Palmer, and KADX(FM), Houston currently provide city grade coverage to their respective cities of license from the sites shown in the attached channel studies.

Hatfield & Dawson Consulting Engineers

Seattle, WA

FM SEPARATION STUDY

Job Title :KEEN @ PALMER on 234 C1

Separation Buffer 100 km

FCC DB Date : 09/14/95

Channel 234C1 (94.7 MHz)

Coordinates : 61-37-22 149-01-06

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
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KADX	Houston		232A	6.00	61-34-05	261.0	37.89	75
CP	AK	BPH921026MB	94.3	80.0	149-43-21		-37.11	SHORT
*To Channel 232C2 per One-Step Application BMPH-941007IG								

KADX	Houston		232C2	10.0	61-20-10	219.6	41.39	79
APP	AK	BMPH941007IG	94.3	247.0	149-30-43		-37.61	SHORT
One-Step Application From Channel 232A								

	Houston		232C2		61-20-10	219.6	41.39	79
ALC	AK		94.3	.0	149-30-43		-37.61	SHORT
Reserved for KADX per One-Step Application BMPH-941007IG								

PADD	Kasilof		233A		60-20-15	221.4	188.17	133
	AK	RM8444	94.5	.0	151-16-20		55.17	CLEAR
Alternate Consideration								

K237CI	Kenai		237D	0.46	DA 60-30-40	225.4	173.58	0
LIC	AK	BLFT870121TC	95.3	.0	151-16-12		.00	TRANS
VIA SATELLITE								

KNIKFM	Anchorage		287C1	51.	61-11-33	224.8	67.23	34
LIC	AK	BLH900507KF	105.3	78.0	149-54-01		33.23	CLEAR

** End of separation study for channel 234C1 **

Hatfield & Dawson, Inc.

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10/03/95

Seattle, WA

FM SEPARATION STUDY

Job Title :KADX @ KYES SITE ON 238 C2

Separation Buffer 100 km

FCC DB Date : 09/14/95

Channel 238C2 (95.5 MHz)

Coordinates : 61-20-10 149-30-47

Call	City		Channel	ERP(kW)	Latitude	Bearing	Dist.	Req.
Status	State	FCC File No.	Freq.	HAAT(m)	Longitude	deg-Tru	(km)	(km)

K237CI	Kenai		237D	0.46	DA	60-30-40	226.8	132.42	0
LIC	AK	BLFT870121TC	95.3	.0		151-16-12		.00	TRANS
VIA SATELLITE									

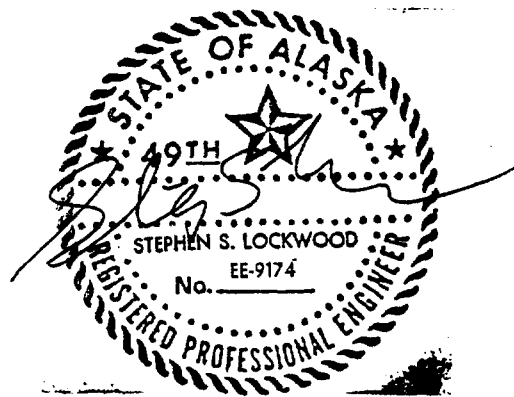
KEEN	Palmer		238C1	51.0		61-37-22	39.3	41.43	224
CP	AK	BPH930204MA	95.5	-34.0		149-01-06		-182.57	SHORT
CP cancelled and call sign deleted 950912									

** End of separation study for channel 238C2 **

This Engineering Statement supporting a Petition for Rulemaking to change the Table of Allotments (§73.202) at Palmer and Houston, Alaska, has been prepared on behalf of Chester P. Coleman, licensee of FM stations KEEN and KADX. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am Registered as a Professional Engineer in the States of Washington and Alaska.

October 2, 1995

Stephen S. Lockwood, P.E.



Hatfield & Dawson Consulting Engineers